

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ROBERT MOORE and FRANK R. FEREZA,
JR., individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

CONSOL PENNSYLVANIA COAL
COMPANY LLC,

Defendant.

CASE NO. 2:23-CV-1991

CLASS / COLLECTIVE ACTION

JURY TRIAL DEMANDED

**DEFENDANT'S AMENDED MOTION FOR AN ORDER REQUIRING PLAINTIFFS'
COUNSEL TO CEASE AND DESIST FROM IMPROPER SOLICITATIONS**

Defendant CONSOL Pennsylvania Coal Company LLC (“CONSOL PA” or “Defendant”) hereby moves entry of an order: (1) against counsel for Plaintiffs Robert Moore and Frank R. Fereza, Jr. (“Plaintiffs”) and Nilges Draher LLC (“Plaintiffs’ counsel”) for their alleged improper solicitations; and (2) requiring them to immediately cease and desist from continued solicitations targeting current and/or former employees of CONSOL PA as well as current and/or former employees of companies affiliated with CONSOL PA. Per the Court’s Practices and Procedures Rule II(A), on January 25, 2024, Defendant’s counsel notified Plaintiffs’ counsel that Defendant would be filing this motion.

Dated: January 25, 2024

/s/ Gerald L. Maatman, Jr.

Gerald L. Maatman, Jr.

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*Attorneys for Defendant CONSOL
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 25, 2024 a copy of the foregoing was filed and served through the Court's ECF system. All parties may access a copy of this document through the Court's system.

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